

EXHIBIT H

1 Case No. 8:23-cv-01243-KK-(DFMx)

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3 JOANNA ARDALAN, ESQ, an individual; ONE LLP, a
4 California Limited Liability Partnership,
5 Plaintiffs,

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7 v.

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9 BINOTECH LLC,; KAREN MUMMERT; MICHAEL MUMMERT;
10 ABDULLAH LIMITED COMPANY, CODERS CUBE LLC, HIK
11 TECH LLC, DATA PATCH, INC., DOE 1, d.b.a LAW
12 INTEGRAL, LLC, business entity unknown; DOE 2,
13 d.b.a DEPUTY TRADEMARK. business entity unknown;
14 DOE 3, p.k.a MICHELLE SPRAGUE, an individual; DOE
15 4, d.b.a TRADEMARK INTEGRAL, business entity
16 unknown; DOE 5, d.b.a BRANDREGISTRATION.ORG,
17 business entity unknown; and DOES 6 through 10,
18 inclusive,

19 Defendants.

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21 September 24, 2024 Meeting

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1 JO ARDALAN: Okay, so I just --

2 HAMZA IMRAN KHAN: Let me just pull it
3 up.

4 JO ARDALAN: -- hit the record button,
5 just, since we're recording now, I just want to
6 be clear that you're okay with me recording this,
7 right?

8 HAMZA IMRAN KHAN: Yeah, that's fine.

9 JO ARDALAN: Okay.

10 HAMZA IMRAN KHAN: I am.

11 JO ARDALAN: Okay. And Abdullah,
12 you're okay?

13 ABDULLAH KHAN: Yeah.

14 JO ARDALAN: Okay, cool. All right, so
15 the floor is yours, you all wanted --

16 HAMZA IMRAN KHAN: Okay.

17 JO ARDALAN: -- to have this call, so.

18 HAMZA IMRAN KHAN: Yeah, so, as we
19 mentioned before, I wanted to share certain
20 documents like our EIN documents with you. For
21 Abdullah and my companies. You should receive an
22 email right about now. It will have our like,
23 registered documents with the state of
24 Pennsylvania.

25 Because one of the complaints that --

1 in the lawsuit, like what we read from our point
2 of view, was that we were misrepresenting or some
3 sort. But like, I just want to make sure like,
4 our addresses are list. We are trying to track
5 down our deed of the address that was mentioned,
6 just to prove that like, it's our family house.
7 But like, my parents own it, we -- these are
8 companies that are small businesses, like mine
9 and Abdullah's.

10 And what -- we are just trying to find
11 a solution that -- to pull our name out of this
12 lawsuit because we are not part of this whole
13 scheme or whatever that was like a thing that was
14 misrepresenting you or like, allegedly being --
15 trying to be you, whoever it was through those
16 emails.

17 So, these are some documents that we
18 could think of that could prove like we are at
19 this address, we are -- we live at this house.
20 And I live five minutes from here, I just moved
21 out like five, three, four months ago.

22 But this is our family home. None of
23 those other people who are named in that
24 complaint are with us -- any association
25 whatsoever. I can also share Mr. Abdullah's

1 was either sold or leaked through this or some
2 sort. And that's why it created a whole fiasco.
3 And I'm sure like they either knew that this
4 website was not active or was not being used
5 whatsoever.

6 Because it cost me a couple hundred
7 bucks to get this website up and running. It was
8 never a major investment for me until I created
9 it because I wanted to start a business but then
10 I got a full-time job in Hunt Valley and so I got
11 preoccupied with that and never had time to do
12 anything with my business or anything sort of
13 thing. Because this business requires sales and
14 reaching out to small businesses and whatnot. I
15 just never had the time for it because I work 40
16 hours a week out of Hunt Valley and York.

17 JO ARDALAN: Okay --

18 HAMZA IMRAN KHAN: And we can also show
19 you --

20 JO ARDALAN: -- do you have any
21 invoices from We Drive Tech?

22 HAMZA IMRAN KHAN: I'll have to hunt
23 down, but I can get those, yes.

24 JO ARDALAN: I'd like to see the
25 invoices and I'd also like to see your payment to

1 them. Would you be willing to show me -- like,
2 how did you pay them?

3 HAMZA IMRAN KHAN: Through I think
4 either Zelle or -- like it's a -- so, how this
5 website was created, a friend of mine who is in
6 this industry, internationally, he's not around
7 here, he's from Pakistan. He was the one who
8 connected me with these people and then I paid
9 him, and he just paid them. But I can get those
10 invoices if you need.

11 JO ARDALAN: Who's your friend?

12 HAMZA IMRAN KHAN: Sarim. He's not in
13 US, his name is Sarim. He's not in US right now,
14 he lives in Pakistan. He does marketing from
15 there, so, I just contacted him because he knows
16 the industry.

17 JO ARDALAN: Who does he do marketing
18 for?

19 HAMZA IMRAN KHAN: I'll have to ask his
20 clients, but like, he's in Pakistan so like, I
21 don't know if he does for US-based companies or
22 not. I'm not really sure.

23 JO ARDALAN: What's his --

24 HAMZA IMRAN KHAN: I was there for
25 summer -- I was there for last summer when I got

1 married in Pakistan, because I am from Pakistan
2 myself. And I was there, he (indiscernible), you
3 know, all that, so, I get the website made.
4 Because it took them like maybe two to three days
5 to get that website up and running for me. So, I
6 just paid them and that was it.

7 JO ARDALAN: How do you spell his name?

8 HAMZA IMRAN KHAN: S-A-R-I-M.

9 JO ARDALAN: And what's his last name?

10 HAMZA IMRAN KHAN: I believe, Q-A-S-M-
11 I. Yeah.

12 JO ARDALAN: Q-A-S?

13 HAMZA IMRAN KHAN: Yeah.

14 JO ARDALAN: A-I?

15 HAMZA IMRAN KHAN: M-I.

16 JO ARDALAN: All right. So, he took
17 the payment and gave it to We Drive Tech?

18 HAMZA IMRAN KHAN: Yes.

19 JO ARDALAN: Okay. And does he work
20 for We Drive Tech?

21 HAMZA IMRAN KHAN: Not that I know of.
22 I don't think so.

23 JO ARDALAN: Okay. All right, well,
24 send me any and all information you want to send
25 me, I'm happy to take a look at it. And we'll go

1 saying, like, I -- this was never sent out to
2 clients, this was never like sent out to anybody,
3 you know, other than me. I'm the one looking at
4 it and maybe like you're looking at it since you
5 like, searched my LLC and all that.

6 JO ARDALAN: Mm hmm.

7 HAMZA IMRAN KHAN: But it was never
8 sent out to any clients, whatnot. Like, no
9 marketing leads were generated from this, nothing
10 like that.

11 JO ARDALAN: Mm hmm. Okay, well all
12 communications between you and Sarim would be
13 helpful to see you know, any discussions if there
14 were discussions about the website.

15 HAMZA IMRAN KHAN: Okay.

16 JO ARDALAN: Right? I mean, I'm sure
17 there's -- you had some kind of text or something
18 about the website, right?

19 HAMZA IMRAN KHAN: Well, they -- that's
20 what I'm saying, they was like, we can develop
21 this website within two days, we have templates,
22 we make these websites --

23 JO ARDALAN: Mm hmm.

24 HAMZA IMRAN KHAN: -- all the time for
25 our clients. Like, you know, he's like, they

1 make it. So, I'm like, okay, why don't you show
2 me like, here's the payment, you know, initial
3 payment --

4 JO ARDALAN: Mm hmm.

5 HAMZA IMRAN KHAN: Why don't you create
6 me one and I'll take a look and see what I need
7 and what I don't need? And then they create it,
8 I you know, I got busy with my stuff and then I
9 got a job right out of college so I just never
10 pursued that. So, like I never went back and
11 made the changes or asked them to made the
12 changes.

13 But I can get you like the bill of
14 invoicing, I think the payment they made --

15 JO ARDALAN: Mm hmm.

16 HAMZA IMRAN KHAN: And any kind of like
17 -- if there was any communication online to them
18 I can get copies of that. Like, I can ask them
19 like, I can ask my friend to give me copies of
20 all that -- any communications he had with them
21 like directly.

22 JO ARDALAN: And -- yeah.

23 HAMZA IMRAN KHAN: And for me like, see
24 -- if you want to make a website in US, it might
25 cost you like, you know, thousands of dollars and

1 it's a big investment. Like, for me to get it
2 made from there, since like the company is from
3 there, it cost me maybe marginally like 5 percent
4 of the cost that it would cost me in the US.

5 So, like it wasn't like a huge
6 investment that was making like maybe you know,
7 \$2,000.00 or \$3,000.00 or maybe like \$6-700.00.
8 It was like a couple hundred bucks, and I paid
9 them in Pakistani currency right there. So, you
10 know, like, it was very marginally cost that you
11 would even think twice about it.

12 It was a webpage that they made, and I
13 was like, okay, I'll take a look when I go back
14 to US, if you know, to edit it and stuff but I
15 just never got back to it. Never got around it,
16 never pursued it.

17 JO ARDALAN: Do you have any sort of
18 documents that were created when you created the
19 LLC? The BinoTech LLC?

20 HAMZA IMRAN KHAN: I just sent you the
21 EIN one though.

22 JO ARDALAN: Oh, hold on.

23 ABDULLAH KHAN: When he started the
24 organization, is that what you're talking about?

25 JO ARDALAN: Yeah, do you have articles

1 HAMZA IMRAN KHAN: Yeah.

2 JO ARDALAN: We're on opposite sides
3 here. So, I can't give you legal advice on how
4 to respond. But you know, perhaps maybe some of
5 the lawyers you spoke with might be able to give
6 you some information.

7 HAMZA IMRAN KHAN: Like -- does this
8 consider a response to you? Like does all of
9 this has to be on paper?

10 JO ARDALAN: This is not a response.

11 HAMZA IMRAN KHAN: Like, that's what
12 I'm trying to ask, because --

13 JO ARDALAN: Yeah. This is not a
14 response. No, this isn't a response sufficient
15 for appearing in the lawsuit. So, you should
16 perhaps talk to the lawyers --

17 HAMZA IMRAN KHAN: Is there a form?
18 Like, is there a form that we need to fill out?
19 Like, that's what I'm trying to get at that, like
20 to --

21 JO ARDALAN: I understand.

22 HAMZA IMRAN KHAN: -- register my
23 deadline that we responded to this lawsuit.
24 Because if I ask a lawyer, like, this one lawyer
25 like charged me like 500 bucks for like 30

C E R T I F I C A T I O N

I, Sonya Ledanski Hyde, certify that the
foregoing transcript is a true and accurate
record of the proceedings.



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